

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jeffrey Weisen,

Plaintiff,

vs.

Wells Fargo,

Defendant.

Case No.: _____

**Notice of Removal
(Jury Trial Demanded)**

TO: THE CLERK OF THE ABOVE-ENTITLED COURT AND PLAINTIFF ABOVE-NAMED THROUGH HIS COUNSEL, PATRICK W. MICHENFELDER, THRONDSET MICHENFELDER, LLC, ONE CENTRAL AVENUE WEST, SUITE 101, ST. MICHAEL, MN 55376:

PLEASE TAKE NOTICE that Defendant Federal Wells Fargo hereby removes to this Court the state action described below.

1. On November 19, 2021, an action was commenced by service as to Wells Fargo in the Fourth Judicial District, Hennepin County, Minnesota, entitled *Jeffrey Weisen v. Wells Fargo*. The case was not filed with the District Court.
2. Wells Fargo was served with the attached Summons and Complaint on November 19, 2021. This Notice is timely.
3. A copy of all process, pleadings, and orders served upon Wells Fargo in the state-court action are attached hereto as Exhibit A (Summons and Complaint).
4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332. It may be removed to this Court by Wells Fargo pursuant to the provisions of 28 U.S.C. § 1441 (a), because it is a civil action between citizens

of different states and because the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs. The undersigned has been informed by Plaintiff's counsel that the amount in controversy exceeds the sum of \$75,000.

5. Wells Fargo is informed and believes that Plaintiff is a citizen of the State of Minnesota. Wells Fargo is incorporated in the State of South Dakota and has its principal place of business in the State of South Dakota.
6. Based upon the foregoing, Wells Fargo requests that this action be removed to the United States District Court for the District of Minnesota.

Dated: December 9, 2021

McCollum Crowley, P.A.

/s/ Robert L. McCollum
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